

# EXHIBIT A

Request for Production Number	Description
Wayfarer RFP No. 4	All Documents and Communications concerning the Film between You and any Wayfarer Defendant, Sony, WME, Jonesworks, any media outlet of any kind, any Social Media accounts or influencers or other individuals who maintain a public online presence, or any cast or crew members of the Film, and any directors, officers, employees, agents, or contractors thereof.
Wayfarer RFP No. 5	All Documents and Communications concerning Ms. Lively between You and any Wayfarer Defendant, Sony, WME, Jonesworks, any media outlet of any kind, any Social Media accounts or influencers or other individuals who maintain a public online presence, or any cast or crew members of the Film, and any directors, officers, employees, agents, or contractors thereof.
Wayfarer RFP No. 6	All Documents and Communications concerning Mr. Reynolds between You and any Wayfarer Defendant, Sony, WME, Jonesworks, any media outlet of any kind, any Social Media accounts or influencers or other individuals who maintain a public online presence, or any cast or crew members of the Film, and any directors, officers, employees, agents, or contractors thereof.
Wayfarer RFP No. 7	All Documents and Communications concerning the Lively/Reynolds Companies and/or the Lively/Reynolds Family between You and any Wayfarer Defendant, Sony, WME, Jonesworks, any media outlet of any kind, any Social Media accounts or influencers or other individuals who maintain a public online presence, or any cast or crew members of the Film, and any directors, officers, employees, agents, or contractors thereof.
Wayfarer RFP No. 8	All Documents and Communications concerning the Digital Campaign between You and any Wayfarer Defendant, Sony,

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	WME, Jonesworks, any media outlet of any kind, any Social Media accounts or influencers or other individuals who maintain a public online presence, or any cast or crew members of the Film, and any directors, officers, employees, agents, or contractors thereof.
Wayfarer RFP No. 9	All Documents and Communications concerning the Actions between You and any Wayfarer Defendant, Sony, WME, Jonesworks, any media outlet of any kind, any Social Media accounts or influencers or other individuals who maintain a public online presence, or any cast or crew members of the Film, and any directors, officers, employees, agents, or contractors thereof.
Wayfarer RFP No. 13	All Documents and Communications from May 1, 2024 through the present for services provided or proposed to be provided by TAG PR.
Wayfarer RFP No. 15	All Documents and Communications from May 1, 2024 through the present services provided or proposed to be provided by Abel.
Wayfarer RFP No. 17	All Documents and Communications from May 1, 2024 through the present concerning services provided or proposed to be provided by Jonesworks.
Wayfarer RFP No. 18	All Documents and Communications reflecting or constituting agreements, whether draft or final, including contracts, retainer agreements, engagement letters, and promises memorialized via email or text message, between You and Street Relations or Wallace.
Wayfarer RFP No. 19	All Documents and Communications from May 1, 2024 through the present concerning services provided or proposed to be provided by Street Relations or Wallace.

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Wayfarer RFP No. 20	All Documents and Communications reflecting any payments, refunds, retainers, incentives, moneys, consideration, inducements, promises to pay, or anything else of value provided to Street Relations or Wallace, by You, or anyone on Your behalf including, but not limited to, Freedman or Liner Freedman Taitelman + Cooley.
Wayfarer RFP No. 22	All Documents and Communications concerning any actual, alleged, or suspected harassment related to the Film.
Wayfarer RFP No. 23	All Documents and Communications concerning any actual, alleged, or suspected discrimination related to the Film.
Wayfarer RFP No. 24	All Documents and Communications concerning any actual, alleged, or suspected retaliation related to the Film.
Wayfarer RFP No. 25	All Documents and Communications concerning any actual, alleged, or suspected workplace misconduct or other inappropriate behavior related to the Film.
Wayfarer RFP No. 26	All Documents concerning any complaint, grievance, or report filed against You, whether in court or arbitration, or with a state, local, or federal agency, in the past 10 years concerning misconduct, discrimination, harassment, or retaliation, including, without limitations, any pleadings, deposition transcripts, and settlement agreements.
Wayfarer RFP No. 30	All Documents and Communications concerning interviews of or statements by any individual concerning any allegation asserted by Ms. Lively in the Action that You have obtained, received, or recorded.
Wayfarer RFP No. 32	All Documents and Communications concerning Ms. Lively that You obtained from any third party.

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Wayfarer RFP No. 35	All Communications with any Person concerning efforts to gather information about Mr. Reynolds, including from his current or former cast, crew, colleague, employee, agent, or other associates.
Wayfarer RFP No. 38	All Documents and Communications concerning efforts to seed, influence, manipulate, boost, amplify, or engage with Social Media related to the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, any Wayfarer Defendant, or the Actions.
Wayfarer RFP No. 39	All Documents and Communications concerning the use of Social Media bots, trolls, troll farms, paid or incentivized accounts, or seeding, amplifying, boosting, or planting content.
Wayfarer RFP No. 40	All Documents and Communications between You, or anyone on Your behalf, and any public relations, crisis management, or Social Media firms concerning the Film, Ms. Lively, Mr. Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, or the Actions.
Wayfarer RFP No. 41	Documents and Communications concerning strategies, plans, or efforts to influence the public perception of the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, or the Lively/Reynolds Family, or the Actions.
Wayfarer RFP No. 42	All Documents and Communications concerning strategies, plans, or efforts to influence the public perception of any Wayfarer Defendant related to the Film.
Wayfarer RFP No. 43	All Social Media messages, comments, or posts (including drafts, as well as deleted messages, comments, or posts) requested, initiated, or made by You, either directly or indirectly concerning the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds

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	Companies, or the Lively/Reynolds Family, or the Actions.
Wayfarer RFP No. 44	All Social Media messages, comments, or posts (including drafts, as well as deleted messages, comments, or posts) requested, initiated, or made by You, either directly or indirectly, concerning any Wayfarer Defendant related to the Film.
Wayfarer RFP No. 49	All Documents and Communications with media or Social Media outlets of any kind concerning the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, the Actions, or any Wayfarer Defendant.
Wayfarer RFP No. 50	All Documents and Communications reflecting or comprising articles, public statements, or press releases requested, initiated, or drafted by You, or anyone on Your behalf, concerning Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, the Film, the Actions, or the Wayfarer Defendants.
Wayfarer RFP No. 51	All Documents and Communications concerning any plan, program, strategy, or campaign by You or any vendor, contractor, or other third-party entity concerning the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, or the Actions.
Wayfarer RFP No. 52	All Documents and Communications concerning the method for rendering “untraceable” any plan, program, strategy, or campaign by You, or any vendor, contractor, or other third-party entity concerning the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, or the Actions.
Wayfarer RFP No. 53	All Documents and Communications concerning the solicitation or procurement of

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	any Social Media content, whether paid or unpaid, concerning the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, or the Actions.
Wayfarer RFP No. 54	All Documents and Communications concerning efforts to conceal or hide any aspect of the solicitation or procurement of any Social Media content, whether paid or unpaid, concerning the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, or the Actions.
Wayfarer RFP No. 55	All Documents and Communications concerning any Agreement for confidentiality protections related to Ms. Lively or the Actions.
Wayfarer RFP No. 56	Metadata for Social Media content of any kind, emails, or digital Communications concerning the authorship, timing, and modification history of posts, messages, articles, or other content (including, without limitation, drafts of such content) related to the Film, Ms. Lively, the Lively/Reynolds Companies, the Lively/Reynolds Family, or the Actions.
Wayfarer RFP No. 57	All Articles, public statements, or press releases, including any drafts of the same, requested, initiated, or drafted by You, or anyone on Your behalf, concerning Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, the Film, the Actions, Baldoni, and/or Wayfarer.
Wayfarer RFP No. 58	All Documents and Communications concerning any allegations, concerns, complaints, or reports of any kind, whether formal or informal, written or oral, concerning Baldoni, Heath or Sarowitz.
Wayfarer RFP No. 62	All Communications and Documents between Wayfarer and IEWU LLC concerning hiring, firing, discipline, complaints, supervision, or

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	work conditions of employees and contractors of Wayfarer or IEWU LLC.
Wayfarer RFP No. 63	All Communications and Documents between Wayfarer and Sony concerning hiring, firing, discipline, complaints, supervision, or work conditions of employees and contractors of Wayfarer or IEWU LLC on the Film.
Wayfarer RFP No. 64	All Communications and Documents between IEWU LLC and Sony concerning hiring, firing, discipline, complaints, supervision, or work conditions of employees and contractors of Wayfarer or IEWU LLC on the Film.
Wayfarer RFP No. 67	All Documents and Communications concerning Your personnel policies and procedures in effect between January 1, 2020 through the present, including but not limited to, employment manuals, employee handbooks, human resources policies, training manuals, and any other policies concerning discrimination, sexual harassment, retaliation, workplace misconduct, or complaint reporting mechanisms.
Wayfarer RFP No. 69	All Documents and Communications concerning any allegations, concerns, complaints, or reports, whether formal or informal, written or oral, of discrimination, harassment, or retaliation raised by any current or former employee about Baldoni or Heath, including without limitation, any settlement agreement or confidentiality provisions related to the same.
Wayfarer RFP No. 70	All Documents and Communications concerning any allegations, concerns, complaints, or reports, whether formal or informal, written or oral, of discrimination, harassment, or retaliation raised by any current or former employee in the last 10 years, including without limitation, any settlement agreement or confidentiality provisions related to the same.



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Wayfarer RFP No. 71	All Documents and Communications concerning any disputes, whether formal or informal, written or oral, between Wayfarer, on the one hand, and any other Person, including but not limited to any member of the cast or crew, the writer, director or producer, on the other hand, of any Wayfarer project since January 1, 2020, including but not limited to Five Feet Apart, Empire Waist, The Last Dance, Man Enough, including without limitation, settlement agreements or confidentiality provisions related to the same.
Wayfarer RFP No. 72	All Documents and Communications concerning any allegations of discrimination, harassment, retaliation or any other unlawful conduct of any kind related to any Wayfarer project since January 1, 2020, including but not limited to Five Feet Apart, Empire Waist, The Last Dance, or Man Enough, including without limitation, settlement agreements or confidentiality provisions related to the same.
Wayfarer RFP No. 76	All Documents and Communications concerning any disciplinary action, reprimands, or corrective measures taken against Baldoni at any time.
Wayfarer RFP No. 77	All Documents and Communications concerning any disciplinary action, reprimands, or corrective measures taken against Heath at any time.
Wayfarer RFP No. 78	All Documents and Communications concerning Your investigation into concerns, allegations, claims, or grievances raised by Ms. Lively, including but not limited to, witness statements, interview notes, reports, or resulting actions taken by You.
Wayfarer RFP No. 79	All Documents and Communications concerning Your investigation into any allegations of inappropriate conduct, harassment, retaliation or misconduct of any

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	kind by anyone related to the Film, including but not limited to, witness statements, interview notes, reports, or resulting actions taken by You.
Wayfarer RFP No. 80	All Documents concerning any equal opportunity, discrimination, harassment, or retaliation training or education You provide, including but not limited to, policies, training materials, videotapes, records of training attendance, and handbooks.
Wayfarer RFP No. 82	All corporate policies, memoranda, or internal Communications concerning discrimination, harassment prevention, retaliation, or workplace safety.
Wayfarer RFP No. 83	All Documents and Communications concerning any allegations of discrimination, harassment, or retaliation made by any current or former employee, applicant, vendor, independent contractor, or any other third party, including but not limited to any payments made in exchange for non-disclosure or confidentiality agreements.
Wayfarer RFP No. 90	Documents, such as phone billing records, sufficient to show all calls You made and/or received concerning the Film, Ms. Lively, Mr. Reynolds, the Lively/Reynolds Companies, the Lively/Reynolds Family, the Digital Campaign, and/or the Actions from May 1, 2024 through the present. Non-responsive information may be redacted.
Wayfarer RFP No. 92	All Communications from the “Dream team” group text, cited on pages 76-80, 82, 84-86, and 88-90 of the Wayfarer SDNY Complaint.
Wayfarer RFP No. 94	All Communications from the “TAG TEAM” group text, cited on pages 180 and 190 of the Wayfarer SDNY Complaint.

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Wayfarer RFP No. 95	All Communications from the unnamed group text, cited on page 70 of Exhibit A to the Wayfarer SDNY Complaint.
Wayfarer RFP No. 156	All Documents and Communications concerning Your retention of Nathan as a “crisis PR specialist,” as alleged in paragraphs 226 and 227 of the Wayfarer SDNY Complaint.
Wayfarer RFP No. 158	All Documents and Communications concerning Your allegation in paragraph 247 of the Wayfarer SDNY Complaint that You “became [an] object[] of public scorn and derision overnight.”
Wayfarer RFP No. 159	All Documents and Communications concerning Your allegation in paragraph 247 of the Wayfarer SDNY Complaint that “Baldoni [has been] wrongfully labeled as a sex pest, his accolades rescinded, and his future projects thrown into doubt.”
Wayfarer RFP No. 162	All Documents and Communications concerning the August 13, 2024, call between Heath and Abel, on the one hand, and “talent agency executives,” on the other hand, as alleged in paragraphs 253 through 255 of the Wayfarer SDNY Complaint.
Wayfarer RFP No. 164	All Documents and Communications concerning Your allegations in paragraphs 274, 283 and 287 of the Wayfarer SDNY Complaint that the “complete communications” and “objective evidence” unequivocally contradict claims that “the Wayfarer [Defendants] orchestrated a premeditated smear campaign.”
Wayfarer RFP No. 178	All Documents and Communications concerning the Investigation.
Wayfarer RFP No. 179	All Documents, including, but not limited to, all notes, video or audio recordings, and interview memoranda prepared by You,

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	Wayfarer, Raines Feldman Littrell LLP, or Adam Investigations Counsel concerning the Investigation.
Wayfarer RFP No. 181	All Communications between You and any Person concerning the Investigation.